REMARKS

This is in response to the Office Action dated May 23, 2005. New claims 7-15 have been added. Thus, claims 1-15 are now pending.

Claim 1 stands rejected as being allegedly anticipated by Ha. This Section 102(b) rejection is respectfully traversed for at least the following reasons.

Claim 1 as amended requires "*an insulating layer provided over at least a substantial part of the switching device so as to be provided between the switching device and the reflective plate, and wherein no portion of the reflective plate extends below an upper surface of the insulating layer.*" For example and without limitation, Fig. 3 of the instant application illustrates that an insulating layer 6 is provided over at least a substantial part of the TFT so as to be provided between the TFT and the reflective plate 13. Moreover, Fig. 3 shows that no portion of the reflective plate 13 extends below an upper surface of the insulating layer 6, because the reflective plate 13 is provided on a top surface of the insulating layer 6.

Ha fails to disclose or suggest the aforesaid italicized features of claim 1. Instead, Ha teaches to the contrary in Fig. 3 by requiring that reflective plate 181 passes downward through a hole in insulator 170 thereby teaching directly away from the invention of amended claim 1. In other words, Ha in Fig. 3 requires that a portion of reflective plate 181 is provided below an upper surface of insulating layer 170, which is the opposite of what claim 1 requires. Claim 1 cannot be anticipated by Ha. Moreover, one of ordinary skill in the art would never have modified Ha to meet claim 1 because to do so would destroy the purpose and functionality of Ha.

Claim 8 requires "*in order to cause a thickness of the liquid crystal layer to be less in a substantial portion of the reflection region than in a substantial portion of the transmission region, an interlayer insulating film is provided between the color filter and the transparent*

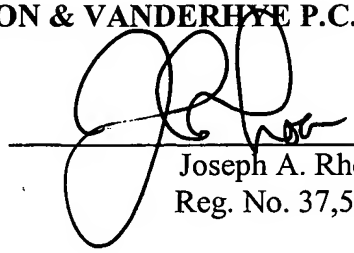
electrode, but only over part of the color filter, so as to cover a substantial portion of the reflective plate." Ha fails to disclose or suggest this. Moreover, JP '625 also fails to disclose or suggest this because layer 22 in JP '625 is provided over the *entire* color filter (not "part" of as called for in claim 8), and also is not provided to cause a thickness of the LC layer to be less in at least a substantial portion of the reflection region than in at least a substantial portion of the transmission region. Thus, citation to JP '625 cannot cure the fundamental flaws of Ha in this respect.

Claim 11 requires that "the transparent electrode is provided closer to the display layer than the color filter so as to cover the color filter, whereas the reflective plate is provided farther away from the display layer than the color filter and the transparent electrode so as to *cover the switching device along the profile of a surface of the switching device.*" For example and without limitation, see Figs. 2-3 of the instant application. Ha fails to disclose or suggest this feature. In Ha, the alleged reflective plate 181 over the switching device has a *flat* shape – and thus does not cover the switching device (e.g., TFT) *along the profile of a surface of the switching device* as called for in claim 11. Ha teaches away from the invention of claim 11 in this respect.

It is respectfully requested that all rejections be withdrawn. All claims are in condition for allowance. If any minor matter remains to be resolved, the Examiner is invited to telephone the undersigned with regard to the same.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: 

Joseph A. Rhoa
Reg. No. 37,515

JAR:caj
901 North Glebe Road, 11th Floor
Arlington, VA 22203-1808
Telephone: (703) 816-4000
Facsimile: (703) 816-4100